

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE:

ALLAN L. REAGAN,

Debtor

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§  
§  
§

CASE NO. 20-11161-tmd

CHAPTER 11

**DEBTOR'S STATEMENT REGARDING OBJECTIONS TO CLAIMS**

TO THE HONORABLE TONY M. DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Allan L. Reagan (the "**Debtor**") files this Statement Regarding Objections to Claims, as follows:

1. The Debtor has filed a series of claims objections on March 22, 2021, relating to claims which are contingent in nature, and based on guaranty obligations.
2. As set forth in the response to the objections to the confirmation of the Debtor's Plan filed on March 18, 2021, the intent of these claims objections is not to prevent any creditor from appearing and objecting a confirmation, nor is it intended to block or disallow any votes which have been cast.
3. The issue on the objections relates to whether the Debtor is qualified to file under Subchapter 5. Although the Debtor fully believes that he meets the requirements of Subchapter 5, on Saturday, March 20, 2021, one creditor (Village @ La Orilla, LLC) filed a motion to dismiss, questioning whether the Debtor met the \$7.5 million cap for filing under Subchapter 5. The Debtor filed these claims objections (which would have been otherwise filed after confirmation) out of an abundance of caution so that no creditor could contend that it had an allowed claim simply because it filed a Proof of Claim.

Respectfully submitted,

WALLER LANSDEN DORTCH & DAVIS, LLP

By: /s/ Mark C. Taylor

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William R. "Trip" Nix  
State Bar No. 24092902  
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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon the parties listed electronically via the Court's ECF system and on all persons on the attached service list on March 22, 2021.

/s/ Mark C. Taylor

Mark C. Taylor

**SERVICE LIST**

**Debtor**

Allan L. Reagan  
585 River Run  
Leander, TX 78641

Headley Investments, LP  
1500 Knobb Hill Lane  
Paoli, PA 19301

**Trustee**

Michael Colvard  
Weston Center  
112 East Pecan Street, Suite 1616  
San Antonio, TX 78205

Frances and Wayne Lee  
468 Jade Tree Lane  
Monterey Park, CA 91754

**Twenty-largest creditors:**

Madison/East Towne LLC  
c/o CBL & Associates  
2030 Hamilton Place Blvd.  
Chattanooga, TN 37421-6000

Capital One Spark Visa for Business  
P.O. Box 30285  
Salt Lake City, UT 84130-0285

Chase Ink Card for Business  
P.O. Box 15298  
Wilmington, DE 19850-5298

Village @ La Orilla  
Attn: Philip Lindborg  
12809 Donette Court N.E.  
Albuquerque, NM 87112

Ford Motor Credit Corp.  
P.O. Box 105704  
Atlanta, GA 30348

Martin S. Headley  
1500 Knobb Hill Lane  
Paoli, PA 19301

Comerica Bank  
Dept. #166901  
P.O. Box 55000  
Detroit, MI 48255-1669

Comerica Bank  
Attn: Lesley B. Higginbotham, VP  
Special Assets Group - Texas Market  
P.O. Box 650282  
Dallas, TX 75265-0282

Citicard Advantage Mastercard  
Cardmember Services  
P.O. Box 6062  
Sioux Falls, SD 57117

Ann E. Headley  
1500 Knobb Hill Lane  
Paoli, PA 19301

Discover Card  
Billing Inquiries  
P.O. Box 30943  
Salt Lake City, UT 84130

Wyndham Franchisor LLC  
22 Sylvan Way  
Parssipany, NJ 07054

Chase Visa Mileage Plus  
P.O. Box 15298  
Wilmington, DE 19850-5298

Spain Family IX LLC  
c/o Patrick J. Spain  
11809 Oak Branch Dr.  
Austin, TX 78737

Comerica Bank  
Attn: J.B. Stueckler, AVP  
300 W. Sixth Street  
Austin, TX 78701

Bennett Living Trust  
Attn: Michael Bennett  
2321 Abbot Kinney Blvd.  
Venice, CA 90291

**Unsecured Creditors/**

**Interested Parties**

3401 Hoteliers, LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Gary J. Neumayer  
2201 Berrywood Lane  
Bloomington, IL 61704-2449

83<sup>rd</sup> Street Development, LLC  
Attn: Trent G. Moore  
9000 Cameron Parkway  
Oklahoma City, OK 73114

Action Propane  
2601 S. Hwy. 183  
Leander, TX 78641

ADT  
P.O. Box 660418  
Dallas, TX 75266

Al Clawson Disposal  
P.O. Box 416  
Jarrel, TX 76537

AT&T  
P.O. Box 5001  
Carol Stream, IL 60197

AT&T (DirectTV)  
P.O. Box 5014  
Carol Stream, IL 60197

Bank of Austin  
Attn: David H. Marks, SVP  
8611 N. Mopac Exp., Suite 101  
Austin, TX 78759

DT Chandler, LLC  
Attn: Bret Anderson, Manager  
140 E. Rio Salado Parkway, Unit 305  
Tempe, AZ 85281

FB Capital, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse AZ, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse Holdco, LLC  
Attn: Allan Reagan  
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Flix Brewhouse Indiana, LLC  
Attn: Allan Reagan  
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Flix Brewhouse Iowa, LLC  
Attn: Allan Reagan  
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Flix Brewhouse NM, LLC  
Attn: Allan Reagan  
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Flix Brewhouse OK, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse SAT, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse III, LLC (Mansfield)  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
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Flix Brewhouse Texas IV, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
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Flix Brewhouse Texas V, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
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Flix Brewhouse TX II, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
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Flix Brewhouse TX IV, LLC  
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Flix Brewhouse Wi, LLC  
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Flix Brewhouse, LLC  
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Flix Entertainment, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Hospitality Investors, Inc.  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Internal Revenue Services  
Centralized Insolvency Office  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Janet L. Reagan  
585 River Run  
Leander, TX 78641

Kathleen R. McCormick  
6801 Greenwood Ave., Unit 210  
Seattle, WA 98103

Lone Star National Bank  
Attn: Sergio Gonzalez, 1<sup>st</sup> VP  
2100 Boca Chica Blvd.  
Brownsville, TX 78520

Merle Hay Investors LLC  
c/o Abbell Credit Corporation  
30 N. LaSalle St., Suite 2120  
Chicago, IL 60602

Mikeska Monahan & Peckham, P.C.  
100 Congress Ave., Suite 990  
Austin, TX 78701

Pedernales Electric Company  
P.O. Box 1  
Johnson City, TX 78636

Poolwerx by Blue Bottom Pool Supply  
3021 S. IH35, Suite 140  
Round Rock, TX 78664

Prudential Mortgage Capital Company LLC  
c/o Prudential  
100 Mulberry St., Gateway Center 4  
8<sup>th</sup> Floor  
Newark, NJ 07102

ROP Artcraft LLC  
Attn: Adam Frank  
5678 N. mesa St.  
El Paso, TX 79912

Round Rock Business Park, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

RPT Realty, L.P.  
19 W. 44<sup>th</sup> Street, Suite 1002  
New York, NY 10036

Securian/Minnesota Life Insurance Co.  
c/o Trinity Real Estate Finance  
100 NE Loop 410, Suite 972  
San Antonio, TX 78216

Southwestern Retail Properties II, LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Southwestern Retail Properties III, LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Southwestern Retail Properties LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Spectrum  
P.O. Box 60074  
City of Industry, CA 91716-0074

UBS Real Estate Securities, Inc.  
c/o Berkadia Commercial Mortgage LLC  
6955 Union Park Center, Suite 450  
Midvale, UT 84047

U.S. Trustee  
903 San Jacinto, Suite 230  
Austin, TX 78701

Wells Fargo Auto  
MAC T9017-026  
P.O. Box 168-48  
Irving, TX 75016-8048

Williamson County Tax Office  
904 S. Main Street  
Georgetown, TX 78626

**Parties Filing Claims**

Discover Bank/Discover Products  
PO Box 3025  
New Albany, OH 43054-3025

JPMorgan Chase Bank, N.A.  
c/o National Bankruptcy Services LLC  
P.O. Box 9013  
Addison, TX 75001

Capital One Bank (USA) N.A.  
By American InfoSource as agent  
4515 N. Santa Fe Ave.  
Oklahoma City, OK 73118

Madison/East Towne, LLC  
Attn: Caleb T. Holzaepfel  
736 Georgia Ave., Ste. 300  
Chattanooga, TN 37402

**Parties Requesting Notice**

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San Antonio, TX 78209

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